



October 12th, 2023

**Via Certified Mail and Electronic Mail:**

Hon. P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

and

Jacob M. Kaplan  
Baker McKenzie LLP  
452 Fifth Avenue  
New York, New York 10018  
Email: jacob.kaplan@bakermckenzie.com

Re: General Electric Company vs. Global Fiberglass Solutions of Texas LLC

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Case 1:23-cv-08346-PKC

Dear Judge Castel:

This letter concerns the above referenced complaint by GE against Global Fiberglass Solutions of Texas, LLC (hereinafter "GFS"). The date for a response is October 13th and with Your Honor's permission, we respectfully request a 30-day extension to November 13th, 2023, to respond to the Plaintiff's Complaint.

The GE complaint was originally served to a registered agent in Texas and had to be forwarded twice before the current GFS attorney received the documents on 9/28/2023. We have since also received a letter from the Texas Secretary of State to Global Fiberglass Solutions of Texas, LLC regarding the resignation of the registered agent, which explains some of the delays.

The address for all correspondence concerning Global Fiberglass Solutions of Texas, LLC is:  
11335 NE 122nd Way, Suite 105  
Kirkland, WA 98034  
USA.

GFS has had initial discussions with 3 attorneys for representation in this matter so far, and although there certainly is interest in representing GFS, the required initial retainer of up to \$100,000.00 is presenting a challenge. Without the retainer in place, apparently even submitting this request for an extension cannot be accomplished, not even by our current attorney. So the main task at hand for GFS is to raise a defense fund to hire a principal trial counsel to present its interests in this matter.

GFS has received an email with documents showing that an Initial Pretrial Conference has been scheduled for November 27, 2023, at 10:00 a.m. We're certainly hoping to have legal representation in place by then.

Based on the foregoing, we respectfully request that an extension be granted.

Please do not hesitate to reach out to the undersigned with any further questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'R. Albrecht', with a vertical line extending downwards from the start of the signature.

Ronald Albrecht, Ph.D.  
for Global Fiberglass Solutions of Texas, LLC  
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